

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

UNITED STATES OF AMERICA

v.

HUGH ELLIS MASON, III,

Defendant.

Case No. 3:22-cr-66-DJN-01

STATEMENT OF FACTS

The United States and the defendant, HUGH ELLIS MASON, III (hereinafter, “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On February 16, 2022, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant knowingly and unlawfully possessed with the intent to distribute more than 100 grams of a mixture and substance that contained a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and defendant possessed with intent to distribute another mixture and substance that contained a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

2. On February 16, 2022, Richmond Police Department narcotics detectives aided by the Virginia State Police and task force officers with the Drug Enforcement Administration (collectively “agents”), executed search warrants at the defendant’s primary residence in Henrico County, Virginia, and at an apartment utilized by the defendant at 4117 North Avenue, No. 6, located in the Lincoln Mews Apartment complex in the City of Richmond, Virginia.

3. At defendant's primary residence, agents recovered several bags containing a total of \$28,566 in U.S. Currency (along with two ripped bills) in the kitchen. In the basement laundry room, agents recovered 2 sets of digital scales that contained heroin and fentanyl residue, items used for preparing and packaging illegal controlled substances, including a sifter, a vacuum sealer, cutting agent, packaging materials, a mixer, false bottom containers and a press used to re-compress illegal controlled substances after they are cut with cutting agents. In the master bedroom, agents recovered a loaded black FN 57, 5.7 caliber semiautomatic handgun bearing serial number 386357075, from under defendant's bed. The weapon had a round of ammunition chambered. Agents recovered additional magazines and ammunition for the weapon. The box the weapon came in was found in the master bedroom closet. Agents also located documents and identifications belonging to the defendant, a Rolex watch and a Gucci watch, a gold money counter, cellphones and an iPad.

4. At defendant's apartment on North Avenue, in the kitchen agents recovered 152.84 grams of a mixture and substance containing heroin and fentanyl from a false-bottom Kool-Aid container; 162.79 grams of a mixture and substance containing heroin and fentanyl; 35.60 grams of a brown powder containing heroin; two FN57 magazines and accompanying 5.7 caliber ammunition; digital scales with powder residue; stacks of lottery tickets (which are commonly used to package user quantities of heroin); multiple containers of cutting agent; vacuum sealer; a Pyrex measuring cup; and a heroin/fentanyl press. In the master bedroom of the apartment, agents recovered personal correspondence and a photo album belonging to the defendant.

5. Defendant possessed the FN 57, 5.7 caliber semiautomatic handgun bearing serial number 386357075 in connection with his drug trafficking activities, in that he possessed the weapon to protect his drugs and drug proceeds and himself while engaged in drug trafficking.

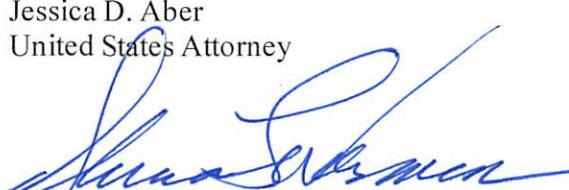
6. From January 2021, through and including February 16, 2022, defendant distributed and possessed with the intent to distribute at least 12 kilograms of cocaine hydrochloride and at least 3 kilograms but less than 10 kilograms of heroin.

7. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

8. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber
United States Attorney


Olivia L. Norman
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, HUGH ELLIS MASON, III, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



HUGH ELLIS MASON, III

I represent the defendant in this matter. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Jose E. Aponte
Attorney for HUGH ELLIS MASON, III